

CLARK HILL PLC  
151 S. Old Woodward Avenue, Suite 200  
Birmingham, Michigan 48009  
Peter A. Jackson  
Joel D. Applebaum  
pjackson@clarkhill.com  
japplebaum@clarkhill.com  
(248) 642-9692

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                              |   |                         |
|------------------------------|---|-------------------------|
| In re:                       | ) | Chapter 11              |
|                              | ) | Case No. 09-50026 (REG) |
| MOTORS LIQUIDATION COMPANY,  | ) | (Jointly Administered)  |
| f/k/a GENERAL MOTORS         | ) |                         |
| CORPORATION, <i>et al.</i> , | ) |                         |
|                              | ) |                         |
| Debtors.                     | ) |                         |

**NOTICE OF CONTINUED PERFECTION  
OF E & L CONSTRUCTION GROUP, INC.'S CONSTRUCTION LIEN**

Under 11 U.S.C. § 546(b)(2), E&L Construction Group, Inc. hereby notifies the Debtors, including Motors Liquidation Company (f/k/a General Motors Corporation) and Environmental Corporate Remediation Company, Inc., of the continued perfection of the construction lien described in the Claim of Lien recorded with the Genesee County, Michigan Register of Deeds on December 22, 2009, as amended by the Amended Claim of Lien recorded with the Genesee County, Michigan Register of Deeds on November 29, 2010, copies of which are attached as Exhibit A and Exhibit B respectively.

Respectfully submitted,

CLARK HILL PLC

/s/ Joel D. Applebaum

Joel D. Applebaum  
Peter A. Jackson  
151 S. Old Woodward Avenue, Suite 200  
Birmingham, Michigan 48009  
(248) 642-9692  
japplebaum@clarkhill.com  
pjackson@clarkhill.com  
Counsel to E & L Construction Group, Inc.

Date: December 15, 2010

# **EXHIBIT A**

FROM

(MON) DEC 21 2009 23:17/ST. 23:17/No. 7593725203 P 2

#08079

GEN. CO. REGISTER OF DEEDS  
RECEIVED

20091222000203 12/22/2009  
P:1 of 4 F:\$23.00 10:03AM  
Rosalyn Bogardus T20090029370  
Genesee County Register ENV

2009 DEC 17 A 11:16

## CLAIM OF LIEN

NOTICE IS HEREBY GIVEN that on the 14 day of September, 2009, E & L Construction Group, Inc., P.O. Box 418, Flint, MI 48501 first provided labor or material for an improvement to:

NAO Flint, ENCORE Site #195 PM #035 COs #s 062, 065 and 069.

SEE ATTACHED LEGAL DESCRIPTION EXHIBIT "A".

Sidwell No. 41-06-201-018. Commonly known as Old Buick City Site, situated in the State of MI, County of Genesee, City of Flint

| Company  | Address   | City    | State | Zip        |
|--|---|---------|-------|------------|
| GM WFG Construction Legal Support Owner  | PCC Central, MC 483-520-197<br>2000 Centerpoint Pkwy. | Pontiac | MI    | 48341      |
| GM WFG Construction Legal Support Owner  | Warren Tech Center, MC 480-111-W55<br>30200 Mound Rd. | Warren  | MI    | 48090      |
| General Motors Corp. nka Motors Liquidation Co. Owner                                      | 300 Renaissance Drive MC: 482-C37-A99                 | Detroit | MI    | 48265      |
| GM Global Headquarters Owner   | 300 Renaissance Drive MC: 482-C37-A99                 | Detroit | MI    | 48265      |
| Environmental Corporate Remediation Co. (Encore) c/o Motors Liquidation Co. Property Owner | 300 Renaissance Drive MC: 482-C37-A99                 | Detroit | MI    | 48265      |
| Environmental Corporate Remediation Co., Inc. ("ENCORE") Property Owner                    | PCC Central, MC 483-520-190<br>2000 Centerpoint Pkwy. | Pontiac | MI    | 48341-3147 |

The last day of providing labor or material was on the 24 day of November, 2009. The Lien claimant's contract amount, including extras, is \$1,065,623.00. The lien claimant has received payment thereon in the total amount of \$0.00 and therefore claims a construction lien upon the above-described real property in the amount of \$1,065,623.00.



E & L Construction Group, Inc.  
P.O. Box 418  
Flint, MI 48501  
(810) 744-4300  
Lien Claimant

BY:

*Carol Ann Gula*  
Carol Ann Gula, Agent  
Michigan Construction Protection Agency  
P.O. Box 1037 Royal Oak, MI 48068  
(248) 586-0100

Date: December 16, 2009

STATE OF MICHIGAN )

) SS

COUNTY OF OAKLAND )

By Carol Ann Gula, Agent for Lien Claimant

Subscribed and sworn to before me this 16 day of December, 2009.

*Beth Austin-Cardona*  
Beth Austin-Cardona  
Notary Public, State of Michigan, County of Oakland  
My commission expires: December 15, 2011  
Acting in the County of Oakland

PREPARED BY AND RETURN TO:  
CAROL GULA, MICHIGAN CONSTRUCTION PROTECTION AGENCY  
P.O. Box 1037 Royal Oak, MI 48068 (248) 586-0100

2300

4/2

EXHIBIT "A"  
LEGAL DESCRIPTION

Lots 6 thru 10, 19 thru 29, 37 thru 56, 64 thru 79, 86 thru 101; also that part of Lots 11, 30, 57, 80 and 105 lying westerly of following described line; Beginning at a point on the northerly line of said Lot 105, 20.00 feet easterly from the northwesterly corner of said Lot; thence southerly to a point on the northerly line of said Lot 80, as originally platted, 20.00 feet easterly from the northwesterly corner of said Lot 80; thence southerly to the northeasterly corner of said Lot 57; thence southerly to a point on the centerline of Easy Street 827.75 feet easterly from the easterly line of St. John Street; thence S 12°44'01" W 532.18 feet; thence along a curve to the left having a radius of 1050.00 feet, a chord bearing and distance of S 11°38'56" W 39.75 feet; thence S 10°33'52" W 271.60 feet to the northerly line of Leith Street as now established, for P.O.E.; all in "Northern Addition to Fairview", Liber 3 of Plats, page 34; also a contiguous part of "River Addition to Fairview", Liber 3 of Plats, page 20A, described as: Lots 1 thru 8, 19 thru 26, Block 14; also Lots 1 thru 17, 36 thru 47; also that part of Lots 18, 19 and 35, all in Block 15 lying westerly of the following described line; Beginning at a point on the northerly line of Lot 105 of Northern Addition to Fairview, 20.00 feet easterly from the northwesterly corner of said Lot; thence southerly to a point on the northerly line of Lot 80, as originally platted, of said subdivision, 20.00 feet easterly from the northwesterly corner of said Lot 80; thence southerly to the ~~northeasterly corner of Lot 57 of said subdivision; thence southerly to a point on the~~ centerline of Easy Street 827.75 feet easterly from the easterly line of St. John Street; thence S 12°44'01" W 532.18 feet; thence along a curve to the left having a radius of 1050.00 feet, a chord bearing & distance of S 11°38'56" W 39.75 feet; thence S 10°33'52" W 271.60 feet to the northerly line of Leith Street as now established, for P.O.E.; also Lots 1 thru 16; Lots 45 & 46; also that part of Lots 17, 35, 36, 37, 38, 39, 40, 41, 42, 43 & 44, all in Block 16 lying northerly and westerly of the following described line: Commencing at a point on the easterly line of St. John Street, 73.00 feet, N 01°01'43" W from the southwest corner of Lot 5, Block 14 of said subdivision; thence N 88°56'12" E along the centerline of vacated Easy Street, 831.53 feet to the westerly line of St. John Parkway for a P.O.B.; thence S 12°44'01" W along said westerly line 532.18 feet; thence along a curve to the left having a radius of 1050.00 feet, a chord bearing & distance of S 11°38'56" W 39.75 feet; thence S 10°33'52" W 271.60 feet to the northerly line of Leith Street as now established; thence S 88°55'56" W along said northerly line, 641.62 feet to the easterly line of St. John Street for P.O.E.; also a contiguous part of "Buick Heights", Liber 3 of Plats, page 25, described as: Lots 88 thru 91; also Lot 87 except the westerly 31.00 feet; also a contiguous part of Fairview, being a subdivision of part of Lots 10, 11, 12, 13 and 14, Section 1, "Smith's Reservation", Liber 55 of Plats, page 435, described as: Lots 1 thru 18, Block 7; also Lots 1 thru 15, Block 8; also Lots 1 thru 13, Block 9; also Lots 1 and 4; also Lots 2 & 3, Block 10 except that part lying westerly and northerly of the following described line: Beginning at a point on the southerly line of Everett Street, 246.65 feet, S 89°01'32" W from its intersection with the westerly line of St. John Street; thence S 10°56'51" W 48.87 feet; thence N 80°35'39" W 25.00 feet to P.O.E. on the centerline of vacated Michigan Avenue; also part of Block 11 described as: Lots 3 thru 21; also part of Lot 2 lying southerly of the following described line: Beginning at a point on the westerly line of said Lot 2, 10.00 feet S 10°56'51" W from the northwesterly corner of said Lot; thence S 80°35'39" E 165.24 feet for a P.O.

# **EXHIBIT B**

201011290079658 11/29/2010  
P:1 of 5 F:\$26.00 3:10PM  
Rosalyn Bogardus T20100028772  
Genesee County Register MLNICH

GENESEE COUNTY RECORDS  
RECEIVED

NOV 23 2 1:04

## AMENDED CLAIM OF LIEN

NOTICE IS HEREBY GIVEN that on the 14 day of September, 2009, E & L Construction Group, Inc., P.O. Box 418, Flint, MI 48501 first provided labor or material for an improvement to:

NAO Flint, ENCORE Site #195 PM #035 COs #s 062, 065 and 069.

SEE ATTACHED LEGAL DESCRIPTION EXHIBIT "A".

Sidwell No. 41-06-201-018. Commonly known as Old Buick City Site, situated in the State of MI, County of Genesee, City of Flint

SEE ATTACHED LIST OF INVOLVED PARTIES EXHIBIT "B"

As previously recorded:

| Lien Action   | Date              | Liber | Page  | Instr #         |
|---------------|-------------------|-------|-------|-----------------|
| RECORDED LIEN | December 22, 2009 | N/A   | 1 - 4 | 200912220080203 |
| AMENDED       | November 17, 2010 | N/A   |       |                 |

This lien is being amended for the following reason: to show lien amount of contracted work completed to date.

The last day of providing labor or material was on the 24 day of November, 2009. The Lien claimant's contract amount, including extras, is \$1,065,623.00. The lien claimant has received payment thereon in the total amount of \$0.00 and therefore claims a construction lien upon the above-described real property in the amount of \$406,717.80.

E & L Construction Group, Inc.

P.O. Box 418

Flint, MI 48501

(810) 744-4300

Lien Claimant



BY:

*Carol Ann Gula*  
Carol Ann Gula, Agent for Lien Claimant  
Michigan Construction Protection Agency  
P.O. Box 1037, Royal Oak, MI 48068-1037  
(248) 586-0100

Date: November 17, 2010

STATE OF MICHIGAN )  
                                  ) SS  
COUNTY OF OAKLAND )

By Carol Ann Gula, Agent for Lien Claimant

Subscribed and sworn to before me this 17 day of November, 2010.

*Beth Austin-Cardona*

Beth Austin-Cardona  
Notary Public, State of Michigan, County of Oakland  
My commission expires: December 15, 2011  
Acting in the County of Oakland

PREPARED BY AND RETURN TO:  
CAROL GULA, MICHIGAN CONSTRUCTION PROTECTION AGENCY  
P.O. Box 1037 Royal Oak, MI 48068 (248) 586-0100

26.00

EXHIBIT "A"  
LEGAL DESCRIPTION

Lots 6 thru 10, 19 thru 29, 37 thru 56, 64 thru 79, 86 thru 101; also that part of Lots 11, 30, 57, 80 and 105 lying westerly of following described line; Beginning at a point on the northerly line of said Lot 105, 20.00 feet easterly from the northwesterly corner of said Lot; thence southerly to a point on the northerly line of said Lot 80, as originally platted, 20.00 feet easterly from the northwesterly corner of said Lot 80; thence southerly to the northeasterly corner of said Lot 57; thence southerly to a point on the centerline of Easy Street 827.75 feet easterly from the easterly line of St. John Street; thence S 12°44'01" W 532.18 feet; thence along a curve to the left having a radius of 1050.00 feet, a chord bearing and distance of S 11°38'56" W 39.75 feet; thence S 10°33'52" W 271.60 feet to the northerly line of Leith Street as now established, for P.O.E.; all in "Northern Addition to Fairview", Liber 3 of Plats, page 34; also a contiguous part of "River Addition to Fairview", Liber 3 of Plats, page 20A, described as: Lots 1 thru 8, 19 thru 26, Block 14; also Lots 1 thru 17, 36 thru 47; also that part of Lots 18, 19 and 35, all in Block 15 lying westerly of the following described line; Beginning at a point on the northerly line of Lot 105 of Northern Addition to Fairview, 20.00 feet easterly from the northwesterly corner of said Lot; thence southerly to a point on the northerly line of Lot 80, as originally platted, of said subdivision, 20.00 feet easterly from the northwesterly corner of said Lot 80; thence southerly to the northeasterly corner of Lot 57 of said subdivision; thence southerly to a point on the centerline of Easy Street 827.75 feet easterly from the easterly line of St. John Street; thence S 12°44'01" W 532.18 feet; thence along a curve to the left having a radius of 1050.00 feet, a chord bearing & distance of S 11°38'56" W 39.75 feet; thence S 10°33'52" W 271.60 feet to the northerly line of Leith Street as now established, for P.O.E.; also Lots 1 thru 16; Lots 45 & 46; also that part of Lots 17, 35, 36, 37, 38, 39, 40, 41, 42, 43 & 44, all in Block 16 lying northerly and westerly of the following described line: Commencing at a point on the easterly line of St. John Street, 73.00 feet, N 01°01'43" W from the southwest corner of Lot 5, Block 14 of said subdivision; thence N 88°56'12" E along the centerline of vacated Easy Street, 831.53 feet to the westerly line of St. John Parkway for a P.O.B.; thence S 12°44'01" W along said westerly line 532.18 feet; thence along a curve to the left having a radius of 1050.00 feet, a chord bearing & distance of S 11°38'56" W 39.75 feet; thence S 10°33'52" W 271.60 feet to the northerly line of Leith Street as now established; thence S 88°55'56" W along said northerly line, 641.62 feet to the easterly line of St. John Street for P.O.E.; also a contiguous part of "Buick Heights", Liber 3 of Plats, page 25, described as: Lots 88 thru 91; also Lot 87 except the westerly 31.00 feet; also a contiguous part of Fairview, being a subdivision of part of Lots 10, 11, 12, 13 and 14, Section 1, "Smith's Reservation", Liber 55 of Plats, page 435, described as: Lots 1 thru 18, Block 7; also Lots 1 thru 15, Block 8; also Lots 1 thru 13, Block 9; also Lots 1 and 4; also Lots 2 & 3, Block 10 except that part lying westerly and northerly of the following described line: Beginning at a point on the southerly line of Everett Street, 246.65 feet, S 89°01'32" W from its intersection with the westerly line of St. John Street; thence S 10°56'51" W 48.87 feet; thence N 80°35'39" W 25.00 feet to P.O.E. on the centerline of vacated Michigan Avenue; also part of Block 11 described as: Lots 3 thru 21; also part of Lot 2 lying southerly of the following described line: Beginning at a point on the westerly line of said Lot 2, 10.00 feet S 10°56'51" W from the northwesterly corner of said Lot; thence S 80°35'39" E 165.24 feet for a P.O.

EXHIBIT "B"  
INVOLVED PARTIES

| Company  | Address   | City    | State | Zip            |
|--|---|---------|-------|----------------|
| GM WFG Capital Projects, Project Legal Support<br>Engineering Center<br>Owner                    | MC: 480-111-W56<br>30200 Mound Rd.                  | Warren  | MI    | 48090          |
| GM WFG - Legal Support Warren Technical<br>Center Campus<br>Owner                                | 30200 Mound Rd.,<br>Bldg. 1 - 11<br>MC: 480-111-W56 | Warren  | MI    | 48090-<br>9010 |
| General Motors Corp. nka Motors Liquidation Co.<br>Owner   | 300 Renaissance Drive<br>MC: 482-C37-A99            | Detroit | MI    | 48265          |
| GM Global Headquarters<br>Owner  | 300 Renaissance Drive<br>MC: 482-C37-A99            | Detroit | MI    | 48265          |
| Environmental Corporate Remediation Co.<br>(Encore) c/o Motors Liquidation Co.<br>Property Owner | 300 Renaissance Drive<br>MC: 482-C37-A99            | Detroit | MI    | 48265          |
| Environmental Corporate Remediation Co., Inc.<br>("ENCORE")<br>Property Owner                    | MC: 480-111-W56<br>30200 Mound Road                 | Warren  | MI    | 48090          |